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6 BEFORE THE WASHINGTON STATE
7 OFFICE OF THE INSURANCE COMMISSIONER

8 IN THE MATTER OF THE
9 APPLICATION REGARDING THE
10 CONVERSION AND ACQUISITION
11 OF CONTROL OF PREMIER BLUE
12 CROSS AND ITS AFFILIATES,

No. G02-45

DECLARATION OF LIZ ARJUN

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WASHINGTON CITIZEN ACTION,
WELFARE RIGHTS ORGANIZING
COALITION, AMERICAN LUNG
ASSOCIATION OF WASHINGTON,
NORTHWEST FEDERATION OF
COMMUNITY ORGANIZATIONS,
NORTHWEST HEALTH LAW
ADVOCATES, SERVICE EMPLOYEES
INTERNATIONAL UNION
WASHINGTON STATE COUNCIL,
THE CHILDREN'S ALLIANCE,
WASHINGTON ACADEMY OF
FAMILY PHYSICIANS,
WASHINGTON ASSOCIATION OF
CHURCHES, WASHINGTON
PROTECTION AND ADVOCACY
SYSTEM AND WASHINGTON STATE
NOW,

Applicants for Intervention.

1 I, Liz Arjun, declare:

2 1. I am a Health Policy Associate at the Children's Alliance. I have
3 been with the Children's Alliance since August 2002 and have worked on a variety of
4 health related issues including efforts to maximize the enrollment of children in state-
5 sponsored health programs, coordinating the Health Coalition for Children and Youth,
6 a coalition of health care providers, advocates and other stakeholders with an interest
7 in children's health, and participating in various coalitions that address the health
8 needs of children.

9 2. The Children's Alliance is a statewide child advocacy organization
10 that champions public policies and practices that deliver the essentials that kids need to
11 thrive - confidence, stability, health, and safety. Children's health is a major focus of
12 The Children's Alliance. The Children's Alliance work on health insurance issues
13 includes bringing the State Children's Health Insurance Program (SCHIP) to
14 Washington state (a state sponsored health insurance program in which Premera is a
15 participating health carrier), advocating for expansion of Medicaid eligibility groups
16 and services, including Medicaid Healthy Options, and protecting access to health care
17 for immigrant children. The Children's Alliance advocates for access to affordable,
18 quality, comprehensive health coverage for all Washington children.

19 3. The Children's Alliance has over 118 member organizations and
20 4000 individual members. Based upon information and belief, some of the Children's
21 Alliance members are Premera enrolled participants or individual or group
22 contractors.

23 4. The Children's Alliance members are also significantly interested
24 in the possible impact of the proposed Premera conversion on Washington state's
25 children. Many of Washington's children receive their coverage through Medicaid
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Healthy Options, the Basic Health Plan and the State Children's Health Insurance Program. Premera's continued involvement in these three programs is critical to continuing to ensure access to health care to children enrolled in state sponsored health coverage. Due to its longstanding advocacy on health access for low-income children, the Children's Alliance has a significant interest in ensuring that Premera's conversion does not impair, and if anything, improves health access for Washington's children.

5. The Children's Alliance members also have a significant interest in the Premera conversion because they are also beneficiaries of the nonprofit assets held by Premera. The Children's Alliance has an interest in how the proceeds from any conversion are used, particularly if the proceeds are dedicated to the creation of a health care foundation in Washington state.

6. If full intervention status is granted, The Children's Alliance, together with the other ten consumer and provider organizations that have jointly sought intervention status, plans to obtain a study of the health impact of the proposed Premiera conversion on Washington state consumers. The health impact study will particularly consider the potential impact of the conversion on access to care for consumers enrolled Medicaid, the Basic Health Plan, the State Children's Health Insurance Program and for low-income rural health consumers. The health impact study will require discovery regarding Premiera's current and future business operations.

I declare under penalty of perjury of the laws of the State of Washington
that the foregoing is true and correct.

DATED this ____ day of November, 2002, at Seattle, Washington.

Liz Arjun

DECLARATION OF LIZ ARIJUN - 3

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